

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
Plaintiff,)
) No. 18 CR 789
v.)
) Hon. Gary Feinerman
DENY MITROVICH,)
)
Defendants.)

**DEFENDANT'S UNOPPOSED MOTION MODIFY
CONDITIONS OF RELEASE**

Now comes the defendant, Deny Mitrovich, by and through his undersigned attorney, and respectfully requests this Honorable Court to modify the conditions of release to allow him to meet with potential publishers for a book he has recently had copywritten. In support, the following is offered:

1. Mr. Mitrovich is released on a \$50,000 secured bond. As part of his conditions of release, he is currently on electronic monitoring with movement allowed for work, doctors' appointments, and meetings with his attorney.
2. Since being on bond, Mr. Mitrovich has had no violations of the conditions of his release.
3. Recently, Mr. Mitrovich wrote a book and had it copywritten. He is hoping to present his book to publishing companies to potentially have his book published.

The conditions of his release as they stand do not allow Mr. Mitrovich movement to meet with potential publishers.

4. Mr. Mitrovich is respectfully requesting this Honorable Court to modify the conditions of his release to allow him to meet with publishing companies. Mr. Mitrovich proposes that for each such meeting, the movement must be approved by Pretrial Services. Specifically, to gain approval from Pretrial Services, Mr. Mitrovich would need to provide his supervising officer with the time, date, and location of the meeting, and verification of the meeting before being approved for the movement.

5. The undersigned has spoken to both Assistant U.S. Attorney Andrew Erksine and Pretrial Services Officer Matthew Bonestroo, both of whom indicated that do not opposed this modification to the conditions of Mr. Mitrovich's release.

Wherefore, for the reasons stated above, defendant Deny Mitrovich respectfully moves this Honorable Court to enter an order modifying the conditions of his release to allow him to meet with potential publishers for his recently copywritten book.

Respectfully submitted,

/s Vadim A. Glzman
Attorney For The Defendant

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CERTIFICATE OF SERVICE

I, Vadim A. Glzman, an attorney for Defendant Deny Mitrovich, hereby certify that on this, the 24th day of October, 2019, I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s/ Vadim A. Glzman

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